

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) **Case No.** 18-20971-CMB
Linda C. Parker,)
 Debtor,) **Chapter 11**
Linda C. Parker,) **Related Document No.** 157
 Movant,)
 vs.)
No Respondent.) **Document No.**

MOTION TO EXTEND THE TIME TO FILE MOTION FOR FINAL DECREE

AND NOW, comes the Debtor, Linda C. Parker, by and through her counsel,
Calaiaro Valencik, and presents the following:

1. Linda C. Parker filed a voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code on March 14, 2018.
2. The Debtor's Chapter 11 Plan was confirmed by Order dated September 11, 2019.
3. The deadline to file a Motion for Final Decree is December 10, 2019.
4. The Debtor has not commenced distributions to creditors under the Plan.
5. The Estate is not ready for the issuance of a final decree.
6. There is a pending final fee application for the attorney for the Debtor which will be resolved prior to the entry of a final decree.
7. The Debtor requests an extension of time to file a Motion for Final Decree.
8. The Debtor requests an extension of time of sixty (60) days to file a Motion of Final Decree.

WHEREFORE, the Debtor requests that this Court grant an extension of sixty (60) days to file a Motion for Final Decree.

Respectfully submitted,

DATED: December 10, 2019

BY: /s/ David Z. Valencik
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